

**AFFIDAVIT OF HENRY EALY, ND,**

STATE OF ARIZONA

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) SS.

COUNTY OF MARICOPA

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DR. HERY L. EALY, III, NMD, declares under penalty of perjury that the foregoing is true and correct:

1. I am above the age of 18 and am competent to make this affidavit.
2. I am a licensed Doctor of Naturopathic Medicine from the Southwest College of Naturopathic Medicine and Health Sciences and Board-Certified Holistic Nutritionist with a Mechanical Engineering Degree from the University of California, Los Angeles.
3. I serve as the lead investigative researcher and author for the Covid Research Team, with over 10 years of experience in database development and data analysis having served on the International Space Station Project.
4. I have over 150 evidence-based published works on natural medicine and the anatomical, physiologic and biochemical sciences of the human body.
5. As the lead investigative researcher and author of the Covid Research Team, my team has invested more than 25,000 hours of volunteer time, which has resulted in the peer-reviewed publications of Covid-19 Data Collection, Comorbidity & Federal Law: A Historical Retrospective, (See Exhibit A, IPAK, Oct. 2020) and Covid-19: Restoring Public Trust During a Global Health Crisis (Exhibit B – GMI, March 2021)
6. I have been retained by the Women of Color for Equal Justice Attorney Jo Saint-George to provide data analysis for certain Class Action lawsuits involving New York City Workers and certain healthcare workers subject to the New York City and/or State Health Department vaccine requirements.

7. In preparation for providing my expert opinions herein, I have reviewed vaccine breakthrough data to establish vaccine failure rates for all persons deemed 'fully vaccinated' according to CDC guidelines from all states publishing data, including New York. Vaccine breakthrough occurs when a 'fully vaccinated' person is confirmed to be infected by the SARS- CoV-2 virus using PCR molecular testing and the cycle threshold value is lower than or equal to 28. 'Fully vaccinated' is defined as a person who has received all inoculations in a series (Pfizer 2 inoculations, Moderna 2 inoculations, Johnson & Johnson 1 inoculation) and it has been at least 14 days since the final inoculation in the series.
8. I have been asked to review New York State vaccine breakthrough data for COVID inoculations to provide support for Dr. Baxter Montgomery's professional and informed opinion that the COVID-19 inoculations do not effectively prevent the spread of the SARS-CoV-2 virus.
9. In New York, between the dates of November 2021 and February 2022, I am able to confirm the following data for breakthrough infections among the 'fully vaccinated'. By November 2021, there were 137,380 total confirmed COVID breakthrough cases among the 'fully vaccinated'. By February 2022, that number had risen exponentially to 1,167,630 confirmed COVID breakthrough cases among the 'fully vaccinated'. This resulted in an increase of 1,030,250 new confirmed cases where the experimental COVID inoculations failed to prevent infection over a 3-month range of data collection amounting to a 749.9% increase in vaccine failure to prevent infection in only 3 months. Similarly, in November 2021, there were 9,044 confirmed COVID breakthrough hospitalizations among the 'fully vaccinated'. By February 2022, that number had risen exponentially to 39,593 confirmed COVID breakthrough hospitalizations among the 'fully vaccinated'. This resulted in an increase of 30,549 new confirmed hospitalizations where the experimental COVID inoculations failed

to prevent hospitalization over a 3-month range of data collection amounting to a 337.8% increase in vaccine failure to prevent hospitalization in only 3 months. With over 1 million confirmed vaccine breakthroughs and over 30,000 confirmed vaccine breakthrough hospitalizations over a 3-month range of data collection, it is impossible to objectively conclude that the experimental COVID inoculations are effective at preventing infection or hospitalization. The New York State Department of Health does not publish data regarding vaccine breakthrough death for analysis.

10. The statements and opinions made in this Affidavit are preliminary and I reserve the right to add to, amend or modify my opinions as more facts are provided during the course of any litigation of the claims by the Classes of Plaintiffs for which this affidavit is provided.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated this 19 day of April, 2022.

  
DR. HENRY EALY

A NOTARY PUBLIC OR OTHER OFFICER COMPLETING THIS CERTIFICATE VERIFIES ONLY THE IDENTITY OF THE INDIVIDUAL WHO SIGNED THE DOCUMENT TO WHICH THIS CERTIFICATE IS ATTACHED, AND NOT THE TRUTHFULNESS, ACCURACY, OR VALIDITY OF THAT DOCUMENT.

Subscribed and sworn to (or affirmed) before me on this 19 day of April, 2022, by Dr. Henry Ealy, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Witness my hand and official seal.

  
Signature of Notary Public

[Affix Notary Seal]

